

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: § Chapter 11
§
API AMERICAS INC., et al., § Case No. 20-10239 (CSS)
§
Debtors.¹ § (Joint Administration Requested)
§

**NOTICE OF AGENDA FOR HEARING ON FIRST DAY MOTIONS SCHEDULED
FOR FEBRUARY 4, 2020 AT 3:00 P.M. (PREVAILING EASTERN TIME)
BEFORE THE HONORABLE CHRISTOPHER S. SONTCHI,
U.S. BANKRUPTCY COURT JUDGE^{2,3}**

**This agenda sets forth items in the order they appear in the first day motions binder
delivered to the Court. The status of each is set forth below.**

1. Voluntary Petitions
 - A. API Americas Inc., Case No. 20-10239 (CSS)
 - B. API (USA) Holdings Limited, Case No. 20-10240 (CSS)
2. Declaration of Mitchell Gendel in Support of Chapter 11 Filing and First Day Pleadings [D.I. 2; filed: 02/02/20]

Status: The declaration will be relied upon as evidentiary support for the first day matters listed below.

First Day Administrative and Procedural Motions

3. Motion of the Debtors for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief [D.I. 3; filed: 02/02/20]

Status: This matter is going forward.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: API (USA) Holdings Limited (3934) and API Americas Inc. (9126). The location of the Debtors' service address is: 3841 Greenway Circle, Lawrence, Kansas 66046.

² The hearing will be held at the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 5th Floor, Courtroom 6, Wilmington, Delaware 19801.

³ Parties who are unable to attend a hearing may request telephonic participation by contacting CourtCall toll free by phone (866-582-6878) or by facsimile (866-533-2946).

4. Motion of the Debtors for Entry of an Order (I) Authorizing the Debtors to File a Consolidated Creditor Matrix, and (II) Authorizing the Debtors to File a Consolidated List of the Debtors' 20 Largest Unsecured Creditors [D.I. 4; filed: 02/02/20]

Status: This matter is going forward.

Retention Applications

5. Application of the Debtors for Entry of an Order Pursuant to 28 U.S.C. § 156(c), Bankruptcy Code Section 105(a) and Local Rule 2002-1(f), Authorizing Appointment of Bankruptcy Management Solutions, Inc. d/b/a Stretto as Claims and Noticing Agent to the Debtors, *Nunc Pro Tunc* to the Petition Date [D.I. 5; filed: 02/02/20]

Status: This matter is going forward.

First Day Motions Pertaining to Business Operation

6. Motion of Debtors for Interim and Final Orders (I) Authorizing Continued Use of Existing Cash Management System, Bank Accounts, and Business Forms and Payment of Related Prepetition Obligations, and (II) Waiving Certain Deposit Requirements [D.I. 6; filed: 02/02/20]

Status: The Debtors will present an interim order, and then seek scheduling of a final hearing on the Motion.

7. Motion of the Debtors for Entry of Interim and Final Orders Authorizing the Debtors to (I) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Expenses and (II) Continue Employee Benefits Programs [D.I. 7; filed: 02/02/20]

Status: The Debtors will present an interim order, and then seek scheduling of a final hearing on the Motion.

8. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Claims of Lien Claimants, and (II) Granting Related Relief [D.I. 8; filed: 02/02/20]

Status: The Debtors will present an interim order, and then seek scheduling of a final hearing on the Motion.

9. Motion of the Debtors for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, and (IV) Granting Related Relief [D.I. 9; filed: 02/02/20]

Status: The Debtors will present an interim order, and then seek scheduling of a final hearing on the Motion.

10. Motion of the Debtors for Entry of Interim and Final Orders Authorizing Payment of Prepetition Claims of Certain Critical Vendors [D.I. 10; filed: 02/02/20]

Status: The Debtors will present an interim order, and then seek scheduling of a final hearing on the Motion.

Financing Motion

11. Motion of the Debtors for Interim and Final Agreed Orders (I) Authorizing the Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [D.I. 11; filed: 02/02/20]

Status: The Debtors will present an interim order, and then seek scheduling of a final hearing on the Motion.

Dated: February 3, 2020

Wilmington, Delaware

SAUL EWING ARNSTEIN & LEHR LLP

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